

ORIGINAL

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(41)
5-21-01
scIN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIAGAIL GALLOWAY,
Plaintiff

v.

PENNSYLVANIA BOARD OF
PROBATION AND PAROLE,
et al.,:
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Civil Action No. 1:00-CV-00649

(Judge Rambo)

FILED
HARRISBURG

MAY 18 2001

MARY E. D'ANDREA, CLERK
Per 918
DEPUTY CLERKMOTION TO COMPEL AND REQUEST FOR SANCTIONS

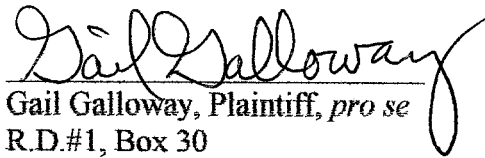
Gail Galloway, ("Plaintiff"), requests the Court to Order Defendant Robert B. Stewart to comply with discovery and answer Plaintiff's Interrogatories which were served on Defendant Stewart on February 27, 2001, and have been totally ignored by Defendant Stewart. Plaintiff has requested Defendant Stewart to comply with the discovery request well after the 30 day time limit and again Defendant Stewart has refused all contact with Plaintiff and refused to answer the Interrogatories and refused to respond in any manner to Plaintiff's request. Defendant Stewart has a verifiable history of refusing to comply with the Federal Rules of Civil Procedure and Discovery and has abused the Court system and Plaintiff's rights to due process and rights to discovery under the Federal Rules of Civil Procedure.

Plaintiff has been deliberately denied discovery required to prepare his case that has prejudiced Plaintiff. Plaintiff requests a 90 day extension of the proceedings and requests the Court to Order Defendant Stewart to comply with the Federal Rules of Civil Procedure as required by law so Plaintiff can properly prepare his case.

Plaintiff also requests the Court to issue sanctions against Defendant Stewart for his deliberate indifference to the Court Ordered Discovery and the Plaintiff's rights under

the Federal Rules of Civil Procedure to full discovery to prepare his case for Court.

Respectfully submitted,

A handwritten signature in cursive script, reading "Gail Galloway". The signature is written in black ink and is positioned above the printed name and address.

Gail Galloway, Plaintiff, *pro se*

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May 14, 2001